

**VCI  
Company**

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***Via ECFS***

March 3, 2008

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW, Suite TW-A335  
Washington, DC 20554

Re: EB Docket No. 06-36; VCI Company Certification of CPNI Filing

Sir/Madam:

VCI Company hereby submits its Certification of CPNI filing.

Questions regarding this filing may be directed to me.

Sincerely,

VCI Company



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Regulatory Attorney

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cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau (by e-mail)  
Best Copy and Printing, Inc., Portals II, 445 12th St. S.W., Room CY-B402, Washington DC 20554 (by e-mail at [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: March 3, 2008

Name of Company covered by this certification: VCI Company

Form 499 Filer ID: 823274

Name of Signatory: Stanley Johnson

Title of Signatory: President

I, Stanley Johnson, certify that I am an officer of VCI Company (the "Company") and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI Rules, 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions against data brokers in the past year. The Company has no knowledge of any attempts by pretexters to access its customers' CPNI. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI or unauthorized disclosure of CPNI.

Signed

  
Stanley Johnson

VCI COMPANY  
OPERATING PROCEDURES FOR ENSURING COMPLIANCE WITH  
47 U.S.C. § 222 and 47 C.F.R. §§ 64.2001 – 2011 (“CPNI Rules”)

VCI Company (“the Company”) recognizes that every telecommunications carrier has a duty to protect the confidentiality of proprietary information of, and relating to, other telecommunications carriers, equipment manufacturers, and customers. The Company understands that a telecommunications carrier that receives or obtains proprietary information from another carrier for purposes of providing any telecommunications service is obligated to use such information only for such purpose, and is not permitted to use such information for its own marketing efforts.

COMPANY SERVICES PROVISION

The Company is a competitive local exchange service provider that serves primarily low-income, residential customers with federal and state subsidized Lifeline and Link-Up services. The Company provides only local exchange service on a flat-fee basis.

DEFINITIONS

Customer Proprietary Network Information (“CPNI”) includes information 1) that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information, which is customer information published in a telephone directory.

Call-detail information includes any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call.

Breach means an incident where a person, without authorization or exceeding authorization, has intentionally gained access to, used or disclosed CPNI.

USE AND DISCLOSURE OF CPNI (§ 64.2005)

The Company markets wireline local exchange service solely through media advertisements and Company brochures that direct the prospective customer to contact the Company on the Company’s toll-free telephone number. The Company does not initiate customer contact for the purpose of marketing its services and does not contract with third-parties to market its services through initiating customer contact.

The Company does not use, disclose, or permit access to CPNI to market to customer’s service offerings that are within a category of service to which the customer does not already subscribe from the Company.

The Company does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers.

The Company uses, discloses and permits access to CPNI solely for the purpose of providing competitive local exchange service to its customers, billing its customers for its service, collecting payment for its service, and facilitating the provision of inside wiring installation, maintenance and repair of service.

Where necessary, the Company may exercise its right to use, disclose or permit access to CPNI to protect its rights or property or the rights or property of its underlying carrier, to protect users of its services and other carriers from fraudulent, abusive, unlawful use of or unlawful subscription to its services.

#### CUSTOMER APPROVAL FOR USE OF CPNI (§ 64.2007)

The Company does not use CPNI for the purposes of marketing communications related services to its customers and does not provide CPNI to third-parties for any marketing purposes. Thus, the Company is not required to obtain opt-out or opt-in approval from its customers or to inform the Commission of instances where opt-out mechanisms do not work properly as provided in § 64.2009(f).

#### CUSTOMER NOTICE FOR USE OF CPNI (§ 64.2008)

The Company does not market communications related services to its customers. Thus, the Company is not required to notify its customers of the right to restrict use of, disclosure of and access to CPNI.

#### SAFEGUARDS FOR USE OF CPNI (§ 64.2009)

The Company does not use or disclose CPNI for the purposes of marketing communications related services to its customers. Thus, the Company is not required to implement a system by which the status of a customer's CPNI approval can be established.

The Company trains its personnel as to when they are and are not authorized to use CPNI and supervises its personnel's use of CPNI. Personnel who misuse CPNI are subject to disciplinary action up to and including termination.

The Company does not use or disclose CPNI for sales or marketing campaigns or conduct outbound marketing. Thus, the Company is not required to maintain records required in § 25.2009(c) or (d).

The Company has designated one or more officers who have personal knowledge of the Company's established operating procedures and of how the procedures are adequate to ensure compliance with the CPNI Rules. A designated officer will sign and file with the Commission, on or before March 1 annually, a compliance certificate and statement explaining how the Company's operating procedures ensure that it is in compliance with the CPNI Rules, explaining any action taken against data brokers, and summarizing all customer complaints received in the previous year concerning the unauthorized release of CPNI.

#### SAFEGUARDS ON CARRIER DISCLOSURE OF CPNI (§ 64.2010)

The Company has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI.

As the Company provides only flat-rated local exchange service, call-detail information is not

available to its customers. If the Company were to offer a service for which call-detail information is billed, the Company would only disclose call-detail information, based on customer-initiated contact, under the following circumstances:

1. The customer provides call detail information without the Company's assistance; or
2. The customer provides the Company with a password not prompted by the Company asking for readily available biographical information or account information

If the customer cannot provide the Company with the information in (1) or (2) above, the Company will:

- a. send call detail information to the customer's address of record; or
- b. call the customer at the telephone number of record.

The Company does not permit customers on-line account access.

The Company does not have retail locations.

The Company establishes passwords after authenticating customers without the use of readily available biographical information or account information. The Company has established a back-up customer authentication method in the event of lost or forgotten password that does not prompt the customer with readily available biographical information or account information. Customers who cannot provide the password or the correct response to the back-up method are required to establish new passwords after being authenticated.

All changes to customer account records, such as address, phone numbers, services or passwords must be requested by an authenticated customer. All such requests are verified by the Company.

The Company does not serve business customers.

#### NOTIFICATION OF CPNI SECURITY BREACHES (§ 64.2011)

The Company will notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) of a breach of its customer's CPNI, within seven (7) days of its determination of such a breach, via the link provided by the FCC at <http://www.fcc.gov/eb/cpni>.

The Company will not notify the public or its customers of such a breach until seven (7) days after notification to the USSS and FBI. The Company will cooperate with law enforcement in the event that law enforcement notifies the Company, in writing, of its determination that public notice or notice to customers of the breach would impede or compromise an ongoing or potential criminal investigation or national security.

The Company will maintain records of any discovered breaches of CPNI, notifications to the USSS, FBI, and customers, including the information required in § 64.2011(d), for a minimum of 2 years.